



July 31, 2025

The Honorable Valerie Figueredo
U.S. Magistrate Judge
United States District Court, Southern District Court of New York
500 Pearl Street
New York, NY 10007

Re: In re DiDi Global Inc. Secs. Litig., No. 1:21-cv-05807
Scheduling Order for Motion to Compel Withheld Documents (ECF 492)

Dear Judge Figueredo:

On July 30, 2025, Your Honor entered a scheduling order (ECF 492) giving DiDi Global, Inc. (“DiDi”) until August 6, 2025 to file an opposition to Plaintiffs’ motion to compel withheld documents (ECF 478) and not permitting Plaintiffs to file a reply brief. Judge Kaplan previously granted Plaintiffs’ motion for a briefing schedule – which DiDi opposed – giving DiDi seven calendar days to file its opposition brief (August 1, 2025) and allowing Plaintiffs three business days to file a reply brief. ECF 455. Plaintiffs respectfully request that Your Honor amend your July 30 Order to conform with Judge Kaplan’s so-Ordered schedule.

On June 24, 2024, the last day of document discovery, DiDi served three new logs pertaining to more than 1,000 documents it either withheld or redacted, claiming either attorney-client privilege or that production would violate PRC Laws, or both. Due to the fact that the scope of the anticipated motion to compel would exceed Judge Kaplan’s four-page limit on discovery motions, after failing to reach an agreement with DiDi concerning a briefing schedule, Plaintiffs’ filed a letter motion requesting the following briefing schedule and enlargement of pages for Plaintiffs’ omnibus motion to compel:

1. Plaintiffs may file a single 15-page double-spaced brief moving to compel documents listed on the three logs DiDi served on June 24, 2025;
2. DiDi’s opposition brief shall be limited to 15-page double-spaced pages and shall be filed within 7 calendar days of the filing of Plaintiffs’ motion;
3. Plaintiffs’ reply shall be limited to seven double-spaced pages and shall be filed within three business days of the filing of DiDi’s opposition;

ECF 453. DiDi opposed Plaintiffs’ request and asked Judge Kaplan for three weeks to file its opposition. ECF 454. On July 15, 2025, Judge Kaplan granted Plaintiffs’ request in full, permitting DiDi only one week to file its opposition brief and allowing Plaintiffs three business days to file a reply brief. ECF 455.

Following DiDi's service of updated logs on July 16, 2025, Plaintiffs filed their motion to compel on July 25, 2025. ECF 478. Pursuant to Judge Kaplan's July 15 Order, DiDi's opposition brief is due by August 1, 2025 and Plaintiffs' reply brief is due by August 6, 2025.

Your Honor's Scheduling Order (ECF 492), in contrast to Judge Kaplan's July 15 Order, allows DiDi twelve days (until August 6) to file an opposition brief and does not address Plaintiffs filing a reply brief. Even if Plaintiffs were allowed three business to file their reply brief as initially ordered, the reply brief would be due on August 11 – the date on which Your Honor has scheduled the hearing on the motion. ECF 492.

Plaintiffs respectfully request that the Court amend its Scheduling Order (ECF 492) to conform to Judge Kaplan's prior Scheduling Order, requiring DiDi's opposition brief be filed by August 1, 2025 and Plaintiffs' Reply Brief to be filed on August 6, 2025.

Finally, the parties are in the process of taking 22 depositions in Hong Kong between now and August 25. Plaintiffs' counsel are now in Hong Kong, and respectfully request the Court schedule any hearing remotely, to commence between the hours of 9:00 a.m. and 11:00 a.m., as Hong Kong is 12 hours ahead of New York.

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen

cc: All counsel of record via ECF